

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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IN RE:	:	Case No.: 17-16968
Nadia M. Rivera	:	
	:	
Debtor(s)	:	Chapter 13

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RESPONSE TO THE MOTION OF FOR RELIEF FROM THE AUTOMATIC STAY  
UNDER SECTION 362(d)

Comes Now, Nadia M. Rivera, hereinafter referred to as "Debtor" by and through her undersigned counsel in response to the Motion for Relief from the Automatic Stay and in support thereof avers as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Denied.
5. Denied.
6. Admitted.
7. Denied. By way of further answer the debtors respectfully request a post petition history of the subject mortgage.
8. Denied.
9. Denied.
10. Denied.
11. Denied.
12. Denied.

Dated: January 8, 2019

/s/Brad J. Sadek, Esquire\_\_\_\_\_  
Brad J. Sadek, Esquire  
Sadek and Cooper  
1315 Walnut Street, #502  
The Philadelphia Building  
Philadelphia, PA 19107  
(215) 545-0008

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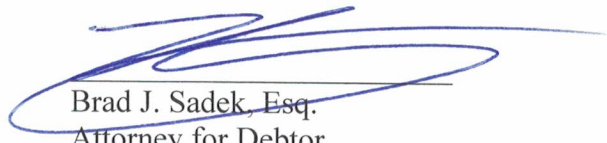
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CERTIFICATE OF SERVICE

I, Brad J. Sadek, Esq. certify that on the date indicated below I served a true and correct copy of the Debtors' Response to the Motion for Relief from Automatic Stay by regular US Mail on the following parties by electronic means and/or regular US mail:

Jerome Blank, Esq.  
1617 JFK Blvd, Suite 1400  
Philadelphia, PA 19103

Dated: January 8, 2019

  
Brad J. Sadek, Esq.  
Attorney for Debtor

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ORDER

AND NOW, this \_\_\_\_\_ day of \_\_\_\_\_, 2019, it is hereby Ordered and  
Decreed that the Movant's Motion for Relief From Automatic Stay Under Bankruptcy  
Code Section 362(d) is denied.

FURTHER ORDERED:

\_\_\_\_\_  
J.